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November 10, 2021

VIA ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Henao et al. v. Parts Authority, LLC et al.*, No. 19-cv-10720 (LGS) (BCM)

Dear Judge Schofield:

This firm represents Plaintiffs in the above-referenced action and we write jointly with Defendants. We apologize for the delay in gathering client signatures and we thank the Court for its guidance regarding the settlements (ECF No. 188). The settlement agreements, attached as Exhibits A, B, and C, contain no limitation on future employment with defendants, and contain no confidentiality provision. The parties respectfully request that the settlements be approved for the reasons set forth in our prior submission (ECF No. 186).

In the event that the Court has any questions or requires any additional information, counsel for the parties are happy to make themselves available for a telephone or in-person conference. We thank Your Honor for your continued time and attention to this matter and our current request.

Respectfully Submitted,

By: /s/Jeremiah Frei-Pearson

Jeremiah Frei-Pearson

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Attachments

cc: All Counsel of Record (via ECF)